## IN THE UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

JAMES JEFFERSON,	)
Plaintiff,	)
v.	) Case No.: 2:08-cv-121-WKW
BEST BUY CO., INC. and HSBC BANK, NEVADA, N.A.,	) ) )
Defendants.	)

## **DEFENDANTS' UNOPPOSED MOTION FOR ENLARGEMENT OF TIME** TO PLEAD IN RESPONSE TO PLAINTIFF'S COMPLAINT

Pursuant to F.R.C.P. 6(b), the defendants, Best Buy Co., Inc. and HSBC Bank, Nevada, N.A., move for an enlargement of time for a period of ten (10) days, or up to and including March 10, 2008, to plead in response to plaintiff's complaint. In support hereof, the defendants state as follows:

- 1. This action was removed to this Court on grounds of diversity jurisdiction on February 20, 2008.
- 2. Undersigned counsel for both defendants was retained recently and currently is evaluating the complaint and associated materials.
- 3. Counsel would request an enlargement of time for a period of ten (10) days to plead in response to the complaint, so as to allow ample time to evaluate plaintiff's allegations and frame the appropriate response thereto.
  - 4. Undersigned counsel has spoken with counsel for plaintiff, who has no

objection to the requested enlargement.

WHEREFORE, premises considered, the defendants request an enlargement of time of ten (10) days, or up to an including March 10, 2008, to plead a response to plaintiff's complaint. The defendants request that such other, further and different relief as justice may require.

Respectfully submitted,

s/Michael M. Shipper MICHAEL M. SHIPPER (SHIPM7574) KIRKLAND E. REID (REIDK9451) Attorneys for Defendants Best Buy and HSBC

## **CERTIFICATE OF SERVICE**

This certifies that a true and accurate copy of the foregoing document has been served electronically upon the following on this 27<sup>th</sup> day of February 2008:

W. Whitney Seals Pate & Cochrane P.O. Box 10448 Birmingham, Alabama 35202-0448

Michael W. Lindsey Weaver Tidmore, LLC 300 Cahaba Park Circle, Suite 200 Birmingham, Alabama 35242

> s/Michael M. Shipper Michael M. Shipper